

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

December 8, 2017

Richard E. Wiley 202.719.7010 rwiley@wileyrein.com

## VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Domestic Section 214 Application Filed for the Transfer of Control of Telequality Communications, Inc. to Education Networks of America, Inc., WC Docket No. 17-285; Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310

## **Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On Thursday, December 7, 2017, David Pierce, Chief Executive Officer of Education Networks of America, Inc. ("ENA"), Timothy Koxlien, Chief Executive Officer of TeleQuality Communications, Inc. ("TeleQuality"), Kitty Conrad, General Counsel of ENA, and Richard E. Wiley of Wiley Rein LLP met with Jay Schwarz, Office of Chairman Pai, to discuss issues in the above-referenced proceedings.

At the meeting, Messrs. Pierce and Koxlien provided a brief overview of ENA's and TeleQuality's dedication to the E-Rate and Rural Healthcare Programs, respectively, the reasons for the pending merger between the companies, and the public interest benefits of the transaction. The positions advanced were consistent with the companies' application in WC Docket No. 17-285.

In connection with the draft Notice of Proposed Rulemaking and Order on the Rural Healthcare Program ("RHC Program") in WC Docket No. 17-310, the representatives commended the Commission for its work on the item, expressed support for waiving the RHC Program's annual cap for Funding Year 2017 while the Commission considers prioritization mechanisms to address increasing demand, and emphasized the desire for simplicity in the administration of the RHC Program.

The representatives also encouraged the Commission to modify the draft Notice of Proposed Rulemaking to seek comment on the feasibility of market-based reforms



Marlene H. Dortch December 8, 2017 Page 2

to achieve the goal of promoting price sensitivity and encouraging healthcare providers to make more cost-effective purchasing decisions. As the Commission has noted in the context of the RHC Program, requiring universal service program beneficiaries to have more "skin the game" provides beneficiaries with incentives to check service provider pricing and obtain lower prices for their services. The companies indicated they intend to file comments in the proceeding expanding on these issues.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206. Should you have any questions, please contact the undersigned.

Sincerely,

/s/ Richard E. Wiley

Richard E. Wiley

cc: Jay Schwarz

See Rural Health Care Support Mechanism, WC Docket No. 02-60, Report and Order, 27 FCC Rcd 16678, ¶ 82 (2012).